

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,) Civil Action No. 6:21-cv-00474-
v.) AA
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.) **DECLARATION OF NATALIE
CARTER**

I, Natalie Carter, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am a resident of College Park, Georgia.
3. I am using a pseudonym as I fear repercussions from Toccoa Falls College if they were to discover who I am and my participation in this suit.
4. I began attending Toccoa Falls College in Toccoa Falls, Georgia in August 2016. I expect to graduate in July 2021.
5. Toccoa Falls College's student handbook states that "The College expects all members of the community to refrain from any form of sexual immorality including, but not limited to, any form of extramarital sexual activity, adultery, promiscuity, touching of intimate parts above or below clothing, homosexual behavior, transgenderism, viewing/participating in pornography, or sharing sexual images of one's self or others. Cohabitation is also not allowed."
6. Students are then encouraged to go to counseling for "proactive education or assistance with relationship issues."
7. I am a queer woman.
8. I did not want to go to this college from the moment I stepped on campus for a tour there during my senior year of high school. I felt a strong vibe that this was not the school for

me. I had not come fully to terms with my sexuality and was suppressing it. I believe this intuition was a warning for me for the future.

9. I do not feel safe on campus and know for a fact that I would not be supported if I came out. I do not know if my school knows about my sexuality or not, but I am under the impression they have an idea and are keeping an eye on me.
10. I personally feel silenced, and my stomach is in knots knowing that I can't be expressive for all that I am.
11. At school, we talk about loving people wholeheartedly and loving all that we are. But I feel like I am not being loved for who I am, but for half of me. If people were to figure out the other half, I would be disowned.
12. I do not feel safe coming out on campus and I do not feel safe coming out on social media because I am afraid of other students at the school outing me or the school finding out about my sexual orientation on its own. The result would be that I would get thrown out.
13. I also think of my future employment. The school has a reputation for being racist and xenophobic, in addition to be homophobic and transphobic. I am afraid that I will be labeled as being like the students who are "phobics," before I can even express my views to a potential employer.
14. I believe that the discrimination that is being done at these Christian universities needs to finally be brought to light because of the inner damage it is doing to their LGBTQ+ students.
15. I am a federal income taxpayer in the United States. I will also have to repay loans from the U.S. Department of Education that I am taking out for attending Toccoa Falls College.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 28 day of March, 2021.

By:

Natalie Carter
Natalie Carter (Mar 28, 2021 19:38 EDT)
Natalie Carter
